

**Strategic Plan**  
**(2/20/06)**

**Documents:**

Short sheet, settling experts

Short sheet, judge

SRD: Meet with judge, meet with court

**Communications:**

Press Releases

Callejas leave/FCPA

Texaco corruption/Remediation and Guanta

San Carlos

Update of trial results

Mobilization

General

Press Conferences with allies/CONAIE, Ponce

NGO full time

Diplomatic program

Ben: find old San Carlos doctor

Documents

Analysis of Why Texaco Losing

Press Kit (Rico) ("Si se puede")

List of people (Carmen)

Appointments:

Vargos Pazos/Chavez

Illingworth/Ambassador

Tandazo/Correa/local legislators

**Legal:**

Judge:

We accuse of falling into Texaco's corruption

We request his removal

Settling Experts

Request doing away with settling experts—unnecessary concept;

Request for just 1, new ones who will accept payments

Inspections

We already waived all but 3-5  
We propose a Global Assessment

Guanta

Request for punishment, more investigation

Callejas

Deceiving the judge, it is a crime: send to Prosecutor General's Office

Other

Reis Veiga witness  
Criminal case  
Civil case Attorney General  
Investigation

Legal Procedural:

Strengthen attorneys  
Lobby court  
Lobby settling experts

Annexes:

Merger/Health/Sampling  
History/Science/Remediation

Other:

Always links each motion to theory of the case

Pablo

Still wants to negotiate a new schedule  
Does not understand the theory of the case  
Can't see the forest for the trees  
We waived inspections  
Does not understand the lack of money  
Does not take advice from Alejandro and me

***Personnel.***

NGO organizer  
2-3 lawyers:  
    Young one for the office  
    Experienced one for lobbying

Measures:

APV/SRD meet with judge  
APV/SRD meet with settling experts  
Alberto speak to judge, comes to San Carlos

**San Carlos plan:**

FCPA  
Photos: Perez Pallares, Callejas, Reis Veiga  
Day before, request RV as witness  
    Julio—resp for fraud  
    Give Maest/Powers doc during inspection  
Theory of the case  
    Tort - 100% Tex, even if PE  
    Tie to Sacha Central/river (Powers)  
Witnesses/technicians  
    Powers/Maest - tie to River  
Witnesses/Health  
    Child with cancer; woman with cancer; old doctor  
    American doctor/toxicologist  
    Cromoso[m]e damage test  
Means: pit tour in the morning, see sick people  
Observers  
    International monitoring  
    National observers: anticorruption commission  
    Technical observers: Gustavo and Fernando

**Donziger Docs**

Ann/Bill document  
Why Tex Losing Case  
San Carlos Media

Lupita: chronicle articles, appts  
Ben: Vargas Pazzos house, SRD receipts, Chevron bush photo  
Fausto: remediation report; settling expert report; gf appt  
Julio: List of laws, with one liners; meeting with comptroller's office; Callejas bar complaint;  
Julio press materials: case summary for judge; fraud press release  
Luis: Bonifaz ltr, appts, Manuel pay shift, go over money  
SRD: Guerra, Yanez

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**Certificado de Exactitud**

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Por el presente certifico que la traducción adjunta es, según mi leal saber y entender, traducción fiel y completa del idioma español al idioma inglés del documento adjunto.

Dated: February 2, 2011  
Fecha: 2 de febrero de 2011

  
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Violeta Lejtman  
Team Lead – Legal Translations  
Merrill Brink International/Merrill Corporation

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Violeta Lejtman  
Líder del equipo – Traducciones Legales  
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Jurado y firmado ante  
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February 2011  
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OFFICES IN MAJOR CITIES THROUGHOUT THE WORLD

**Strategic Plan**  
**(2/20/06)**

**Documentos:**

Short sheet, Peritos dirimientes  
Short sheet, judge

SRD: Meet with judge, meet with court

**Communications:**

**Boletines**

Callejas leave/FCPA  
Texaco corruption/Remediation and Guanta  
San Carlos  
Update of trial results  
Mobilization

**General**

Press Confernces with allies/CONAIE, Ponce  
ONG tiempo complete  
Programa Diplomatica  
Ben: find old San Carlos doctor

**Documents**

Analysis of Why Texaco Losing  
Press Kit (Rico) ("Si se puede")  
Lista de personas (Carmen)

**Citas:**

Vargos Pazos/Chavez  
Illingworth/Embajadora  
Tandazo/Correa/local legislators

**Legal:**

**Juez:**

Acusamos de caer en corrupcion de Texaco  
Pedimos su salida

**Peritos Dirimientes**

Pide retiro de peritos dirimientes como concepto innecesario;  
Pide solo 1, nuevos quienes aceptaran pagos

Inspecciones

Desistimos todos menos 3-5 ya  
Proponemos Peritaje Global

Guanta

Pedimos castigo, mas investigacion

Callejas

Engano al juez, es delito – send to fiscalia

Otra

Reis Veiga testigo  
Caso penal  
Caso civil procurador  
Investigacion

Legal Procesal:

Fortalecimiento de abogados  
Cabildeo de corte  
Cabildeo de dirimientes

Anexos:

Fusion/Health/Sampling  
History/Science/Remediation

Otra:

Siempre vincula cada escrito a teoria del caso

Pablo

Todavia quiere negociar nuevo calendario  
No entiende teoria del caso  
Metido en arboles, no vea el bosque  
Desistimos inspecciones  
No entiende la falta de plata  
No escuche consejo do yo y alejandro

***Personnel:***

ONG organizador  
2-3 abogados:  
    Joven para oficina  
    Viejo para cabildear

Medidas:

APV/SRD meet with judge  
APV/SRD meet with peritos dirimientes  
Alberto hable con el juez, viene a San Carlos

**Plan San Carlos:**

FCPA  
Photos: Perez Pallares, Callejas, Reis Veiga  
Dia antes, pida RV como testigo  
    Julio—resp para el fraude  
    Give Maest/Powers doc during inspection  
Tcoria del caso  
    Tort – 100% Tex, even if PE  
    Tie to Sacha Central/river (Powers)  
Testigos/Tecnico  
    Powers/Maest – tie to River  
Testigos/Salud  
    Nino con cancer; mujer con cancer; Viejo medico  
    Medico/toxicologico Estadounidense  
    Cromosone damage test  
Medios: gira para piscinas en la manana, ver gente enferma  
Observadores  
    Monitoreo Internacional  
    Veeduría nacional – commission anti-corrupcion  
    Veeduría tecnica – Gustavo y Fernando

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